

Rom Bar-Nissim (SBN: 293356)
Rom@HeahBarNissim.com
HEAH BAR-NISSIM LLP
1801 Century Park East, Suite 2400
Los Angeles, CA 90067
Telephone: 310.432.2836

Attorneys for Plaintiff
Ted Entertainment, Inc.

Bahram Niknia (SBN: 293356)
bniknia@NikniaLaw.com
NIKNIA LAW FIRM INC.
1875 Century Park East, Suite 1240
Los Angeles, CA 90067
Telephone: 310-601-8025

Attorneys for Defendant
Morgan Kamal Majed p/k/a Frogan

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

**TED ENTERTAINMENT, INC., a
California Corporation,**

Plaintiff,

v.

**MORGAN KAMAL MAJED p/k/a
FROGAN, an individual, and DOES
1-10**

Defendants.

Case No.: 2:25-cv-5565

**JOINT STIPULATION RE:
EXTENDING THE DEADLINE FOR
DEFENDANT TO RESPOND TO
THE COMPLAINT**

1 **WHEREAS**, on June 19, 2025, Plaintiff Ted Entertainment, Inc. (“TEI”)
2 initiated the present action by filing its complaint for direct copyright infringement
3 against Defendant Morgan Kamal Majed p/k/a Frogan (“Frogan”) (Dkt. No. 1);

4 **WHEREAS**, on July 18, 2025, TEI filed a proof of service for serving the
5 complaint on Frogan on July 14, 2025 (Dkt. No. 12);

6 **WHEREAS**, on August 1, 2025, counsel for Frogan contacted counsel for
7 TEI by email to contest the validity of service of the complaint on Frogan;

8 **WHEREAS**, in the same email, counsel for Frogan offered to resolve the
9 issue and avoid unnecessary motion practice by: (1) having TEI withdraw the July
10 18, 2025 proof of service; and (2) having Frogan execute a waiver of service
11 pursuant to Federal Rule of Civil Procedure (“FRCP”) Rule 4(d) and receive an
12 additional sixty (60) days to respond to the complaint pursuant to FRCP Rule
13 12(a)(1)(A)(ii);

14 **WHEREAS**, on the same day, counsel for TEI responded to counsel for
15 Frogan and – without conceding the validity of the objections to service –
16 expressed agreement regarding avoiding unnecessary motion practice regarding the
17 service of the complaint;

18 **WHEREAS**, in the same email, counsel for TEI offered to streamline the
19 resolution of the issue by granting Frogan an additional sixty (60) days to respond
20 to the complaint;

21 **WHEREAS**, counsel for Frogan agreed to this arrangement – so long as
22 Frogan preserved her right to file any responsive pleading pursuant to FRCP Rule
23 12 with the exception of contesting service under FRCP Rules 12(b)(4-5) – and
24 counsel for TEI agreed;

25 **WHEREAS**, good cause exists for the stipulation because: (1) it resolves the
26 parties’ issue concerning service; (2) conserves the time and resources of this Court
27 and the parties by avoiding unnecessary motion practice; and (3) ensures Frogan
28 has sufficient time to respond to the complaint.

1 **THEREFORE, IT IS HEREBY STIPULATED**, by and between the
2 parties through their respective attorneys of records, that: (1) this Court grant the
3 Stipulation; (2) that Frogan's deadline to respond to the complaint be continued
4 from August 4, 2025 to October 3, 2025; (3) that Frogan can respond to the
5 complaint with any responsive pleading pursuant to FRCP Rule 12 with the
6 exception of contesting service under FRCP Rules 12(b)(4-5); and (4) the Court
7 enter the Order lodged concurrently herewith.

8
9 Dated: August 5, 2025

HEAH BAR-NISSIM LLP

10
11 By /s/ Rom Bar-Nissim
12 **ROM BAR-NISSIM**
13 Attorneys for Plaintiff Ted
14 Entertainment, Inc.

15
16 Dated: August 5, 2025

NIKNIA LAW FIRM, INC.

17
18 By /s/ Barham Niknia
19 **BARHAM NIKNIA**
20 Attorneys for Defendant Morgan
21 Kamal Majed p/k/a Frogan

22
23 Pursuant to Civil L.R. 5-4.3.4(a)(2)(1), the filer attests that all other
24 signatories listed, and on whose behalf this filing is submitted, concur in the filing's
25 content and have authorized the filing.
26
27
28